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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,
Plaintiff,

10 vs.

11 MARCELO ESCOBAR-LARA
Defendant.

CASE NO.: 2:18-cr-00240

**DEFENDANT'S UNOPPOSED MOTION TO
CONDUCT A PRE-PLEA PRESENTENCE
INVESTIGATION REPORT AND
PROPOSED ORDER**

13 Defendant, MARCELO ESCOBAR-LARA, by and through his counsel, Maysoun Fletcher,
14 with The Fletcher Firm, P.C., submits his Unopposed Motion to Conduct a Pre-Plea Presentence
15 Investigation Report and Proposed Order.

16 Dated this 20th day of March, 2019.

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18 By: /s/ Maysoun Fletcher
Maysoun Fletcher, Esq.
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STATEMENT OF FACTS

On August 8, 2018, Mr. Escobar-Lara was indicted on 13 counts as follows: 1) one count of conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§841(a)(1) and (b)(1)(B)(i); 2) five counts of distribution of a controlled substance in violation of 21 U.S.C. §§841(a)(1) and (b)(1)(B)(i); 3) two counts of distribution of a controlled substance in violation of 21 U.S.C. §§841(a)(1) and (b)(1)(C); 4) one count of possession with intent to distribute marijuana in violation of 21 U.S.C. §§841(a)(1) and (b)(1)(C); 5) two counts of illegal alien in possession of a firearm in violation of 18 U.S.C. §§922(g)(5)(A) and 924(a)(2); and 6) two counts of possession of a firearm during a crime of drug trafficking in violation of 18 U.S.C. §924(c)(1)(A)(i). Trial is currently set for April 22, 2019.

Given the fact that Mr. Escobar-Lara might face sentencing enhancements, defense counsel requests a Pre-Plea PSR. Counsel for the United States does not oppose the request. Additionally, defense counsel requests that the Court order its preparation.

Dated this 20th day of March, 2019.

By: /s/ Maysoun Fletcher
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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,
Plaintiff,

CASE NO.: 2:18-cr-00240

10 vs.

ORDER

11 MARCELO ESCOBAR-LARA
12 Defendant.

13 IT IS HEREBY ORDERED that the Department of Parole and Probation prepare a pre-plea
14 presentence investigation report for Defendant Marcelo Escobar-Lara.

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16 Dated this 21st day of March, 2019.

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18 UNITED STATES MAGISTRATE JUDGE
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